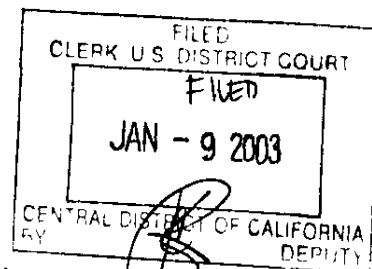


1 KENNETH J. GUIDO (Cal. Bar No. 040020)
 2 PAUL R. BERGER
 3 RUSSELL G. RYAN
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 5 DEREK M. MEISNER
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 8 Securities and Exchange Commission
 9 450 Fifth Street, N.W.
 10 Washington, D.C. 20549-0911
 11 Telephone: (202) 942-7933
 12 Facsimile: (202) 942-9581



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13 **UNITED STATES DISTRICT COURT**
 14 **CENTRAL DISTRICT OF CALIFORNIA**
 15 **WESTERN DIVISION**

16 SECURITIES AND EXCHANGE
 17 COMMISSION,

18 Plaintiff,

19 vs.

20 LEON JORDAN II,
 21 JORDAN HOLDINGS,
 22 JORDAN ENTERPRISES, LLC,
 23 RAY BROWN & ASSOCIATES, and
 24 RAYMOND BROWN,

25 Defendants,

26 SHEILA S. JORDAN,

27 Relief Defendant.

NO. CV 02-9889 PA (CTx)

[PROPOSED] PRELIMINARY
 INJUNCTION AND ORDERS: (1)
 FREEZING ASSETS; (2)
 PROHIBITING THE
 DESTRUCTION OF
 DOCUMENTS; AND (3) FOR
 ACCOUNTINGS AGAINST
 DEFENDANT RAYMOND
 BROWN AND RAY BROWN &
 ASSOCIATES

[Fed R. Civ. P. 65]

Date: January 9, 2003

Time: 3:00 p.m.

Courtroom of the Honorable
 Percy Anderson

28 This matter came to be heard upon the Consent of Raymond Brown and Ray
 Brown & Associates to Plaintiff Securities and Exchange Commission's
 ("Commission") Application For An Order To Show Cause Why A Preliminary
 Injunction And Order Freezing Assets, Prohibiting Destruction Of Documents,

///

JAN 13 2003

14

1 Granting Expedited Discovery, And For Accountings Should Not Issue
2 (“Application”).

3 The Court, having considered the Commission’s Complaint, the Application,
4 the supporting Memorandum of Points and Authorities, Declaration of Jo E.
5 Mettenburg and Exhibits thereto, the Consent of Raymond Brown and Ray Brown
6 & Associates (“Brown Defendants”), and all other evidence and argument presented
7 regarding the Application, finds that this Court has jurisdiction over Brown
8 Defendants, and the subject matter of, this action, and that it is hereby ORDERED
9 that the Commission’s Application For A Preliminary Injunction; Order Freezing
10 Assets; Order Prohibiting Destruction Of Documents; and Order For Accountings
11 against Brown Defendants is GRANTED, as set forth herein.

12 **I.**

13 IT IS HEREBY ORDERED that, pending the determination of a hearing on
14 the merits, Brown Defendants and their officers, agents, servants, employees,
15 attorneys, subsidiaries and affiliates, and those persons in active concert or
16 participation with any of them, who receive actual notice of this Order, by personal
17 service or otherwise, and each of them, be and hereby are restrained and enjoined
18 from, directly or indirectly, in the offer or sale of any securities, by the use of any
19 means or instruments of transportation or communication in interstate commerce or
20 by use of the mails:

- 21 A. employing any device, scheme or artifice to defraud;
- 22 B. obtaining money or property by means of any untrue statement of a
23 material fact or any omission to state a material fact necessary in order
24 to make the statements made, in light of the circumstances under which
25 they were made, not misleading; or
- 26 C. engaging in any transaction, practice, or course of business which
27 operates or would operate as a fraud or deceit upon the purchaser;
28 in violation of Section 17(a) of the Securities Act, 15 U.S.C. § 77q(a).

1 25920 Brown's Lane
Holden, Louisiana 70744

2 The Financial Plaza
3 5235 Florida Boulevard
Suite A, B, D, E
4 Baton Rouge, Louisiana 70806

5 *Provided that* Brown Defendants may obtain a mortgage on the 25920
6 Brown's Lane property (Raymond Brown's primary residence) in an amount no
7 greater than \$125,000.00, for the purpose of depositing the \$77,500.00, above,
8 paying attorneys' fees and costs, and paying incidental expenses.

9 *Provided further that* Brown Defendants shall file this Order as a *lis pendens*
10 or other similar instrument under Louisiana law, to effectuate the terms of this
11 Paragraph IV of this Order.

12 **V.**

13 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court,
14 pending the determination of a hearing on the merits, Brown Defendants, and their
15 officers, agents, servants, employees, attorneys, subsidiaries and affiliates, and those
16 persons in active concert or participation with any of them, who receive actual
17 notice of this Order, by personal service or otherwise, and each of them, be and
18 hereby are restrained and enjoined from, directly or indirectly: destroying,
19 mutilating, concealing, transferring, altering, or otherwise disposing of, in any
20 manner, any documents, which includes all books, records, computer programs,
21 computer files, computer printouts, correspondence, memoranda, brochures, or any
22 other documents of any kind in their possession, custody or control, however
23 created, produced, or stored (manually, mechanically, electronically, or otherwise),
24 pertaining in any manner to Defendants Jordan, Jordan Enterprises, Jordan
25 Holdings, Brown, Brown & Associates, and Relief Defendant Sheila Jordan.

26 **VI.**

27 IT IS FURTHER ORDERED that Brown Defendants, shall, within ten (10)
28 days of the date of issuance of this Order, prepare and deliver to the Commission a

1 detailed and complete schedule of all of their personal assets, including all real and
 2 personal property exceeding \$1,000 in value, and all bank, securities, futures and
 3 other accounts identified by institution, branch address and account number. The
 4 accountings shall include a description of the source(s) of all such assets. Such
 5 accountings shall be filed with the Court and copies shall be delivered to Kenneth J.
 6 Guido, Assistant Chief Litigation Counsel in the Commission's Washington D.C.
 7 Office, 450 Fifth Street N.W., Washington, DC 20549-0911. After completion of
 8 the accountings, Brown Defendants shall each produce to Kenneth J. Guido in the
 9 Commission's Washington, D.C. Office, at a time agreeable to the Commission, all
 10 books, records and other documents supporting or underlying their accountings.

11 VII.

12 IT IS FURTHER ORDERED that this Court shall retain jurisdiction over this
 13 action for the purpose of implementing and carrying out the terms of all orders and
 14 decrees which may be entered herein and to entertain any suitable application or
 15 motion for additional relief within the jurisdiction of this Court.

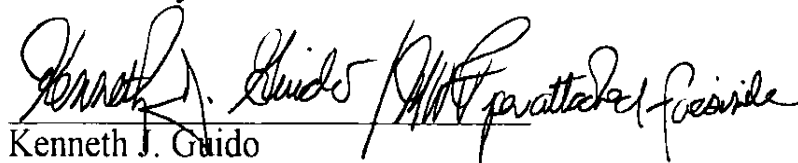
16 IT IS SO ORDERED.

17 Dated: January 9, 2003.



20 HONORABLE PERCY ANDERSON
 21 United States District Judge

22 Presented by:



23 Kenneth J. Guido
 24 Assistant Chief Litigation Counsel
 25 Attorney for Plaintiff
 26 Securities and Exchange Commission
 27
 28

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2 personal property exceeding \$1,000 in value, and all bank, securities, futures and
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11 VII.

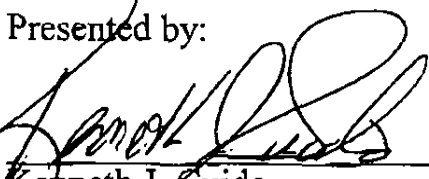
12 IT IS FURTHER ORDERED that this Court shall retain jurisdiction over this
13 action for the purpose of implementing and carrying out the terms of all orders and
14 decrees which may be entered herein and to entertain any suitable application or
15 motion for additional relief within the jurisdiction of this Court.

16 IT IS SO ORDERED.

17 Dated: January __, 2003.

18
19
20 HONORABLE PERCY ANDERSON
21 United States District Judge

22 Presented by:

23 

24 Kenneth J. Guido
25 Assistant Chief Litigation Counsel
26 Attorney for Plaintiff
27 Securities and Exchange Commission
28

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA)
)ss.
 COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 601 West Fifth Street, Suite 1150, Los Angeles, California 90071-2025.

On January 8, 2003, I served the foregoing document described a **[PROPOSED] PRELIMINARY INJUNCTION AND ORDERS: (1) FREEZING ASSETS; (2) PROHIBITING THE DESTRUCTION OF DOCUMENTS; AND (3) FOR ACCOUNTINGS AGAINST DEFENDANT RAYMOND BROWN AND RAY BROWN & ASSOCIATES** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows

Kenneth J. Guido, Esq.
 Securities and Exchange Commission
 450 Fifth Street, N.W.
 Washington, D.C. 20549-0911
 (202) 942-7933 Telephone
 (202) 942-9581 Facsimile

☒ Via U.S. Mail I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Los Angeles, California. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U S postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ Via Facsimile I am familiar with the office practice of Corbin & Fitzgerald, LLP for collecting, processing and transmitting facsimile. Under that practice, I faxed the above-described document to the facsimile number referenced above. The facsimile of the above-described document was transmitted to the following parties from Los Angeles, California on December 9, 2002, at the times noted on the attached confirmation sheet.

Executed on January 8, 2003, at Los Angeles, California.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made


 Sandra Vaughn